FILED DALLAS COUNTY 11/20/2019 2:13 PM **FELICIA PITRE** DISTRICT CLERK

DC	C-19-18635	Angie Avina
CAUSE NO		
DALLAS COUNTY HOSPITAL DISTRICT	S	
D/B/A PARKLAND HEALTH &	S	IN THE DISTRICT COURT
HOSPITAL SYSTEM; PALO PINTO	S	
COUNTY HOSPITAL DISTRICT A/K/A	Š	
PALO PINTO GENERAL HOSPITAL;	Š	
GUADALUPE VALLEY HOSPITAL	Š	
A/K/A GUADALUPE REGIONAL	\$ \$	
MEDICAL CENTER; VHS SAN	Š	
ANTONIO PARTNERS, LLC D/B/A	Š	OF DALLAS COUNTY, TEXAS
BAPTIST MEDICAL CENTER, MISSION	Š	,
TRAIL BAPTIST HOSPITAL, NORTH	S S	
CENTRAL BAPTIST HOSPITAL,		
NORTHEAST BAPTIST HOSPITAL, and	\$ \$	
ST. LUKE'S BAPTIST HOSPITAL;	Š	
NACOGDOCHES MEDICAL CENTER;	Š	I-162ND
RESOLUTE HOSPITAL COMPANY, LLC	S	JUDICIAL DISTRICT
D/B/A RESOLUTE HEALTH; THE	Š	·
HOSPITALS OF PROVIDENCE EAST	Š	
CAMPUS; THE HOSPITALS OF	\$ \$ \$	
PROVIDENCE MEMORIAL CAMPUS;	S	
THE HOSPITALS OF PROVIDENCE	Š	
SIERRA CAMPUS; THE HOSPITALS OF	\$ \$ \$	
PROVIDENCE TRANSMOUNTAIN	Š	
CAMPUS; VHS BROWNSVILLE	Š	
HOSPITAL COMPANY, LLC D/B/A		
VALLEY BAPTIST MEDICAL CENTER -	\$ \$ \$	
BROWNSVILLE; VHS HARLINGEN	S	
HOSPITAL COMPANY, LLC D/B/A	S	
VALLEY BAPTIST MEDICAL CENTER;	S	
ARMC, L.P. D/B/A ABILENE	S	
REGIONAL MEDICAL CENTER;	S	
COLLEGE STATION HOSPITAL, LP;	S	
GRANBURY HOSPITAL CORPORATION	•	
D/B/A LAKE GRANBURY MEDICAL	S	
CENTER; NAVARRO HOSPITAL, L.P.	S	
D/B/A NAVARRO REGIONAL	S	
HOSPITAL; BROWNWOOD HOSPITAL,	S	
L.P. D/B/A BROWNWOOD REGIONAL	\$ \$ \$	
MEDICAL CENTER; VICTORIA OF	S	
TEXAS, L.P. D/B/A DETAR HOSPITAL	S	
NAVARRO and DETAR HOSPITAL	S	
NORTH; LAREDO TEXAS HOSPITAL	S	
COMPANY, L.P. D/B/A LAREDO	S	
MEDICAL CENTER; SAN ANGELO	S	
HOSPITAL, L.P. D/B/A SAN ANGELO	S	

EXHIBIT

COMMUNITY MEDICAL CENTER; CEDAR PARK HEALTH SYSTEM, L.P. D/B/A CEDAR PARK REGIONAL MEDICAL CENTER; NHCI OF HILLSBORO, INC. D/B/A HILL REGIONAL HOSPITAL; LONGVIEW MEDICAL CENTER, L.P. D/B/A LONGVIEW REGIONAL MEDICAL **CENTER**; and **PINEY WOODS** HEALTHCARE SYSTEM, L.P. D/B/A WOODLAND HEIGHTS MEDICAL CENTER.

Plaintiffs,

vs.

AMNEAL PHARMACEUTICALS, LLC; AMNEAL PHARMACEUTICALS, INC.; TEVA PHARMACEUTICALS USA, INC.; CEPHALON, INC.; JOHNSON & JOHNSON; JANSSEN PHARMACEUTICALS, INC.; ORTHO-**MCNEIL-JANSSEN** PHARMACEUTICALS, INC. n/k/a JANSSEN PHARMACEUTICALS, INC.; JANSSEN PHARMACEUTICA, INC. n/k/a JANSSEN PHARMACEUTICALS, INC.; ABBOTT LABORATORIES; ABBOTT LABORATORIES, INC.; ASSERTIO THERAPEUTICS, INC. f/k/a DEPOMED, INC.; NORAMCO, INC.; **ENDO HEALTH SOLUTIONS, INC.; ENDO PHARMACEUTICALS, INC.;** MALLINCKRODT, LLC; MALLINCKRODT PLC: SPECGX LLC: ALLERGAN PLC; WATSON LABORATORIES, INC.; ACTAVIS LLC f/k/a ACTAVIS INC.; ACTAVIS PHARMA, INC. f/k/a WATSON PHARMA. INC.; ANDA, INC.; H.D. SMITH, LLC f/k/a H.D. SMITH WHOLESALE DRUG CO.; HENRY SCHEIN, INC.; **AMERISOURCEBERGEN CORPORATION:** AMERISOURCEBERGEN DRUG CORPORATION; CARDINAL HEALTH, INC.; MCKESSON CORPORATION; CVS

HEALTH CORPORATION; CVS
PHARMACY, INC.; WALGREEN CO.;
WALGREENS BOOTS ALLIANCE, INC.;
WALMART INC.; RICHARD ANDREWS;
THEODORE OKECHUKU; NICOLAS
PADRON; CARLOS LUIS VENEGAS; and
JOHN DOES 1 TO 100.

Defendants.

PLAINTIFFS' NOTICE OF RELATED CASES

Pursuant to Dallas County Local Rules 10.6, 1.07(a), and 1.08, Plaintiffs hereby provide notice to this Court that an earlier filed lawsuit, styled: Dallas County Hospital District D/B/A Parkland Health & Hospital System, et al, v. Purdue Pharma L.P., et al, in the 162nd Judicial District Court, Dallas County, Texas; Cause No. DC-19-13794, was filed on September 3, 2019, is so related to the instant, second filed lawsuit that a transfer of the later filed lawsuit to the 162nd Judicial District Court would facilitate orderly and efficient disposition of the litigation. Plaintiffs further give notice that a copy of this pleading will be simultaneously provided to the 162nd Judicial District Court.

Dated: November 20, 2019 Respectfully Submitted,

/s/ Warren T. Burns

Warren T. Burns (SBN 24053119) Darren Nicholson (SBN 24032789)

Will Thompson (SBN 24094981)

BURNS CHAREST LLP

900 Jackson Street, Suite 500

Dallas, Texas 75202 Main: 469-904-4550

Main: 469-904-455

Fax: 469-444-5002

Wburns@burnscharest.com dnicholson@burnscharest.com wthompson@burnscharest.com

Rick Yelton III (SBN 24113469)

Lydia A. Wright*

BURNS CHAREST LLP

365 Canal Street, Suite 1170

New Orleans, LA 70130

Main: 504-799-2845 Fax: 504-881-1765

Ryelton@burnscharest.com Lwright@burnscharest.com

Zona Jones (SBN 10887600)

HARRISON DAVIS STEAKLEY MORRISON JONES, P.C.

850 Park Street

Beaumont, TX 77701

PH: (409) 753-0000

FAX: (409) 833-0075

Zona@TheTrialLawyers.com

Don Barrett*

BARRETT LAW GROUP, P.A.

404 Court Square North Lexington, MS 39095-0927 Office: 662-834-9168

donbarrettpa@gmail.com

Jonathan W. Cuneo

Monica Miller

Mark H. Dubester

David L. Black

Jennifer E. Kelly

Evelyn Li

CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Avenue, NW, Suite 200

Washington, DC 20016

Telephone: (202)789-3960

jonc@cuneolaw.com

monica@cuneolaw.com

mark@cuneolaw.com

dblack@cuneolaw.com

jkelly@cuneolaw.com

evelyn@cuneolaw.com

Steve Martino

Ruth Lichtenfeld

TAYLOR MARTINO, P.C.

455 St. Louis Street

Mobile, AL 36602 Telephone: (251) 433-3131 <u>stevemartino@taylormartino.com</u> <u>ruth@taylormartino.com</u>

Attorneys for Plaintiffs
*Pro Hac Vice to be filed